

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

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|---------------------------------|---|-------------------------------|
| MIDAS GREEN TECHNOLOGIES, LLC, | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | CIVIL ACTION NO. 6:24-CV-166- |
| | § | ADA |
| GREEN REVOLUTION COOLING, INC., | § | |
| | § | |
| Defendant. | § | |
| | § | |

**DECLARATION OF ASHLEY N. MOORE IN SUPPORT OF DEFENDANT GREEN
REVOLUTION COOLING, INC.'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Ashley N. Moore, hereby declare as follows:

1. I am an attorney at law duly licensed to practice law in the State of Texas, admitted to the United States District Court for the Western District of Texas, and am a shareholder of the law firm of Greenberg Traurig, LLP, attorneys of record for Green Revolution Cooling, Inc. (“GRC”) in the above entitled action, and make this declaration in support of GRC’s Opening Claim Construction Brief. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could and would competently testify as set forth below.

2. Attached hereto as Exhibit 1 is a true and correct copy of the claim construction Order (Dkt. 84), entered on November 22, 2021, in the case captioned *Midas Green Technologies, LLC v. Immersion Systems, LLC*, No. 4:20-cv-00555-O (N.D. Tex.).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Joint Stipulation on Claim Construction (Dkt. 50), filed on July 11, 2022, in the case captioned *Green Technologies, LLC v. Rhodium Enterprises, Inc., et al.*, No. 6:22-cv-00050-ADA (W.D. Tex.).

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of Exhibit A of Plaintiff’s Preliminary Infringement Contentions, served on August 9, 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of the November 4, 2016 Non-Final Rejection, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.

6. Attached hereto as Exhibit 5 is a true and correct copy of the January 31, 2017 Amendment and Response to Non-Final Rejection, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.


7. Attached hereto as Exhibit 6 is a true and correct copy of the May 17, 2017 Final Rejection, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.

8. Attached hereto as Exhibit 7 is a true and correct copy of the June 11, 2018 Non-Final Rejection, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.

9. Attached hereto as Exhibit 8 is a true and correct copy of the July 6, 2017 Notice of References Cited, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.

10. Attached hereto as Exhibit 9 is a true and correct copy of the June 28, 2017 Applicant Initiated Interview Summary, in the file history for application number 14/355,533, which issued as U.S. Patent No. 10,405,457.

Dated: November 25, 2024



Ashley N. Moore